



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Deborah Jones, Treasurer
Whirlpool Corporation Political Action
Committee
2000 M 63
Benton Harbor, MI 49022

SEP 25 2002

Identification Number: C00039040

Reference: Mid-Year (1/1/01-6/30/01), Year End (7/1/01-12/31/01), April
Quarterly (1/1/02-3/31/02) and July Quarterly (4/1/02-6/30/02) Reports

Dear Ms. Jones:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report discloses aggregate year-to-date totals for contributions received from individuals which appear to be incorrect. Please be advised that federal regulations require aggregate year-to-date totals to include only those contributions which are received during the calendar year. In the event that the aggregate year-to-date total is correct, please note that federal regulations also require the disclosure of all contributions received from individuals who have contributed over \$200. 11 CFR §104.3(a)(4). Please amend your report to provide the correct aggregate year-to-date totals.

-Schedule A supporting Line 11(a)(i) discloses contributions received through a payroll deduction plan. Generally, a committee's report must identify each contribution from an individual which in the aggregate exceeds \$200 during the calendar year. (2 U.S.C. §434(b)). For your information, instead of separate itemization, a committee using a payroll deduction plan may disclose the aggregate amount of contributions received from the contributor through the payroll deduction plan during the reporting period; the identification of the individual where the contribution

exceeds \$200 in the aggregate during the calendar year; and a statement of the amount deducted per pay period. Please refer to the enclosed sample of properly reported payroll deductions. 11 CFR §104.8(b)

A response or amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Jane Parks
Campaign Finance Analyst
Reports Analysis Division

PAYROLL DEDUCTIONS

SCHEDULE A (FEC Form 3X)		Use separate transcript for each category or use Detailed Summary Page		FOR EACH RECEIPT (check only one)		PAGE 1 of 1	
ITEMIZED RECEIPTS				<input type="checkbox"/> 11a <input type="checkbox"/> 11b <input type="checkbox"/> 11c		<input type="checkbox"/> 11d <input type="checkbox"/> 11e <input type="checkbox"/> 11f	
Any information copied from even reports and documents may be used by any person for the purpose of soliciting contributions or for determining expenses, other than using the name and address of any political committee to send correspondence from such committee.							
NAME OF COMMITTEE (in full)							
Critical Response Inc. PAC							
Full Name (Last, First, Middle Name)							
A. Keith Ginterwald							
Mailing Address							
1000 Lakeside Dr.							
City State Zip Code							
Knoxville TN 37999							
FEC ID number of committee (general political committee)							
10							
Name of Employer							
Critical Response Inc.							
Occupation							
Executive Director							
Receipt For							
<input type="checkbox"/> Salary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)							
Aggregate Year-to-Date							
285.00							
Date of Receipt							
<input type="checkbox"/> 11a <input type="checkbox"/> 11b <input type="checkbox"/> 11c <input type="checkbox"/> 11d <input type="checkbox"/> 11e <input type="checkbox"/> 11f							
Amount of Each Payment This Period							
90.00							
(\$15 bi-weekly)							

Adding Extra Text/Explanation When using FECFile electronic filing software, this information can be entered using the "memo text" window. To make a "memo text" entry, select the "View" menu on the FECFile toolbar. Select "All Transactions." Single click (highlight) the transaction on which the "memo text" will be attached. Then select the "Edit" menu on the toolbar and select "memo text."

When using FECFile electronic filing software, enter this information in the "transcript" field.

Categorizing Receipts

Before beginning to itemize the committee's receipts, separate them into the different categories listed on the Detailed Summary Page ("Contributions from Individuals," "Contributions from Political Committees," etc.; an illustration of a completed Detailed Summary Page appears on pages 54-55). The receipts in each category must be itemized on a separate Schedule A designated for that category.

Indicate the type of receipt itemized on a particular Schedule A by checking the box for the corresponding line number from the Detailed Summary Page where indicated in the upper right corner of the schedule. The appropriate category of receipt may also be written at the top of each page.

Some categories may require several pages. The total for each category should be entered on the bottom line of the last page for that category.

Itemized Information

For each itemized contribution, provide:

- The full name and address (including zip code) of the contributor or other source;
- The name of the contributor's employer (if the contributor is an individual);

- The contributor's occupation (if the contributor is an individual);
- The date of receipt;
- The amount; and
- The aggregate year-to-date total of all receipts (within the same category) from the same source. 104.3(a)(3).

The space indicating the election for which an itemized contribution was made ("Receipt For") does not apply to SSFs; leave those boxes blank.

Special "Employer" Information

If a contributor is self-employed, that should be recorded in the Employer space. If a contributor is not employed, the Employer space should be left blank, but the Occupation space should always be completed (e.g., "unemployed," "retired," "homemaker").

Best Efforts Required

Note that committees and their treasurers must use "best efforts" to obtain and report the information listed above. See page 36 for more information.

Payroll Deductions

Once an individual's deductions aggregate over \$200 in a calendar year, report the total amount deducted from the donor's paychecks during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, type "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor. 104.8(b).

EXAMPLE: During an election year, a corporate manager authorizes her employer to deduct \$15 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's first-quarter contributions (\$90 for six pay periods) as "unitemized contributions" on Line 11(a)(ii) in the April quarterly report.

By June 30 (the closing date for the July quarterly report), 13 pay periods have passed, and the manager's aggregate contributions are \$195—still below the \$200 itemization threshold. The manager's second-quarter contributions again are included in "unitemized contributions" in the July report.

By September 30 (the closing date for the October quarterly report), 19 pay periods have passed, and the manager's contributions reach \$285. Now the committee itemizes the total contributions received from the manager during the third quarter (\$90), providing the year-to-date total in the appropriate space. (See Item A in the illustration above.)



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Jane Parks
Campaign Finance Analyst
Reports Analysis Division

PAYROLL DEDUCTIONS

SCHEDULE A (FEC Form 3X) ITEMIZED RECEIPTS		(Use separate receipts) for each category of (M) (listing Summary Page)	FOR LINE NUMBER PAGE OF								
(Use separate receipts) for each category of (M) (listing Summary Page)		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%; text-align: center;"> <input checked="" type="checkbox"/> 11a </td> <td style="width: 25%; text-align: center;"> <input type="checkbox"/> 11b </td> <td style="width: 25%; text-align: center;"> <input type="checkbox"/> 11c </td> <td style="width: 25%; text-align: center;"> <input type="checkbox"/> 11d </td> </tr> <tr> <td style="text-align: center;"> <input type="checkbox"/> 12 </td> <td style="text-align: center;"> <input type="checkbox"/> 13 </td> <td style="text-align: center;"> <input type="checkbox"/> 14 </td> <td style="text-align: center;"> <input type="checkbox"/> 15 </td> </tr> </table>		<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 11d	<input type="checkbox"/> 12	<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15
<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 11d								
<input type="checkbox"/> 12	<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15								

Any information copied from each receipt and the receipts may not be sold or used by any person for the purpose of securing contributions or for determining eligibility, nor can using the name and address of any political committee to solicit contributions from such person. See Rule 104 of the Federal Election Commission.

NAME OF COMMITTEE (to P.O.)
Critical Reason Inc. 210

At Name (Last, First, Middle Initial) <u>Mr. J. J. J. J. J.</u> Address <u>3000 Highway Ave.</u> City <u>Springfield</u> State <u>VA</u> Zip Code <u>22155</u> FEC Number of Committee (Federal Official Committee) C	Date of Receipt <div style="border: 1px solid black; padding: 5px; text-align: center;"> MONTH DAY YEAR 01 01 2001 </div> Amount of Cash Receipt (in Dollars) <div style="border: 1px solid black; padding: 5px; text-align: center;"> \$ 100.00 </div>
Name of Employer <u>Critical Reason Inc.</u> Receipt for: <input type="checkbox"/> Salary <input type="checkbox"/> Other <input type="checkbox"/> Other (specify) <u>W</u>	Description <u>Executive Officer</u> Applicable Year-to-Date Y <div style="border: 1px solid black; padding: 5px; text-align: center;"> 2001 </div>

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⁴ When using PDFFile extractor, please software enter this information in the "Description" field.

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2025-03-27 14:00:00